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13 *Attorney for Defendants*

14 *MIKE STINSON, LINDA STINSON, THE STINSON*

15 *2009 GRANTOR RETAINED ANNUITY TRUST,*

*7HBF NO. 2, LTD., STARTUP CAPITAL*

*VENTURES, L.P., AND STEPHEN J. SHAPER*

16  
17 **UNITED STATES DISTRICT COURT**

18 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

20 KIMETRA BRICE, et al

Case Number: 3:19-cv-01481-WHO

21 Plaintiffs,

**JOINT STIPULATION TO EXTEND  
PLAINTIFFS' TIME TO RESPOND TO  
MOTIONS TO DISMISS AND  
DEFENDANTS' TIME TO REPLY TO  
PLAINTIFFS' OPPOSITIONS AND  
RESET HEARING DATE**

22 v.

23 MIKE STINSON, et al,

24 Defendants.

1 Pursuant to Civil Local Rule 6-1(b), Plaintiffs Kimetra Brice, Earl Browne, and Jill  
2 Novorot (“Plaintiffs”) and Defendants Mike Stinson, Linda Stinson, The Stinson 2009 Grantor  
3 Retained Annuity Trust, 7HBF No. 2, Ltd., LLC, Startup Capital Ventures, L.P., and Stephen J.  
4 Shaper (the “Stinson Defendants”), by and through their respective counsel, respectfully stipulate  
5 as follows:

6 **WHEREAS,**

7 1. On March 21, 2019, Plaintiffs filed a Complaint against Defendants (Dkt. 1).  
8 2. On December 18, 2019, Defendants Mike Stinson, Linda Stinson, 7HBF No. 2,  
9 Ltd., LLC, and Stephen J. Shaper filed a Motion to Dismiss (Dkt. 82).

10 3. On December 18, 2019, Defendants Linda Stinson and Stephen J. Shaper filed a  
11 separate Motion to Dismiss (Dkt. 83), and a corresponding request for judicial notice (Dkt. 84).

12 4. On December 18, 2019, Defendant The Stinson 2009 Grantor Retained Annuity  
13 Trust filed a Motion to Dismiss (Dkt. 85).

14 5. Plaintiffs’ oppositions to the aforementioned Motions to Dismiss (Dkt. Nos. 82-  
15 85) were initially due January 2, 2020.

16 6. Due to the holidays, the parties stipulated, however, that Plaintiffs would have  
17 until January 21, 2020 to respond to the afore-mentioned Motions to Dismiss (Dkt. Nos. 88),  
18 which the Court approved on January 3, 2020.

19 7. In the interim, Plaintiffs and the Stinson Defendants have been engaged in meet  
20 and confers regarding discovery matters. In addition, a mediation with, *inter alia*, the Stinson  
21 Defendants has been scheduled for February 18, 2020.

22 8. Given the imminently scheduled mediation, the parties have agreed to continue  
23 the February 12, 2020 hearing date on the pending motions to dismiss until April 8, 2020, and  
24 further extend the time for Plaintiffs to respond to the various pending Motions to Dismiss (Dkt.  
25 Nos. 82-85) until March 11, 2020, with the Stinson Defendants’ replies being due March 25,  
26 2020.

27 9. In the event the mediation is unsuccessful, Plaintiffs expect additional discovery  
28 will be needed to respond to Defendants’ motions to dismiss, which the parties anticipate will

1 likely be the subject of discovery dispute letters with the Court that may necessitate further  
2 extensions.

3 **THEREFORE, IT IS NOW HEREBY STIPULATED AND AGREED**, by and  
4 between the undersigned, by and through their counsel that:

5 8. The deadline for Plaintiffs to respond to each of the Stinson Defendants' Motions  
6 to Dismiss (Dkt. Nos. 82-85) shall be March 11, 2020.

7 9. The deadline for the Stinson Defendants to reply to Plaintiffs' oppositions shall be  
8 March 25, 2020.

9 10. The February 12, 2020 hearing date on the pending motions to dismiss is to be  
10 vacated.

11 11. The hearing on the Stinson Defendants' Motions to Dismiss shall be held on April  
12 8, 2020 at 2:00 pm.

14 Dated: January 17, 2020

Respectfully submitted,

15 /s/ Maren I. Christensen  
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10 *MIKE STINSON, LINDA STINSON, THE  
11 STINSON 2009 GRANTOR RETAINED  
12 ANNUITY TRUST, 7HBF NO. 2, LTD.,  
13 STARTUP CAPITAL VENTURES, L.P., AND  
14 STEPHEN J. SHAPER*

15 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

16 DATED: January 21, 2020



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THE HON. WILLIAM H. ORRICK  
United States District Judge

1                           **ATTESTATION**

2                           I, Maren Christensen, hereby attest pursuant to N.D. Cal. Local Rule 5-1(i)(3), that all  
3 signatories to this document have concurred in this filing.

4                           */s/ Maren I. Christensen*

5                           Maren I. Christensen

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